

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION**

AMERICAN SPIRIT AND CHEER  
ESSENTIALS, INC., ROCKSTAR  
CHAMPIONSHIPS, LLC, JEFF &  
CRAIG CHEER, LLC, d/b/a JEFF  
AND CRAIG CAMPS, and ASHLEY  
HAYGOOD, Individually and on  
Behalf of all Others Similarly Situated,  
Plaintiffs,

v.

VARSITY BRANDS, LLC, BSN  
SPORTS, LLC, VARSITY SPIRIT,  
LLC, STANBURY, LLC, HERFF  
JONES, LLC, BAIN CAPITAL, LP,  
CHARLESBANK CAPITAL  
PARTNERS, LLC, VARSITY  
BRANDS HOLDING CO., INC.,  
VARSITY SPIRIT FASHION &  
SUPPLIES, LLC, U.S. ALL STAR  
FEDERATION, INC., USA  
FEDERATION FOR SPORT  
CHEERING, d/b/a USA CHEER,  
VARSITY INTROPA TOURS, LLC  
and JEFF WEBB,

Defendants.

CIVIL ACTION  
FILE NUMBER:  
2:20-cv-02782-SHL-tmp

**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing

**(1) MOTION TO COMPEL AND FOR SANCTIONS;**

**(2) MEMORANDUM IN SUPPORT; AND**

**(3) CERTIFICATE OF CONSULTATION**

with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to the following attorneys of record:

Adam S. Baldrige  
Nicole D. Berkowitz  
Grady M. Garrison  
Matthew Sinon Mulqueen  
BAKER, DONELSON, BEARMAN, CALDWELL & BERKOWITZ, P.C.  
165 Madison Avenue, Suite 2000  
Memphis, TN 38103

Edward L. Stanton, III  
BUTLER SNOW LLP  
6075 Poplar Avenue  
Suite 500  
Memphis, TN 3119

George Cary  
Steven J. Kaiser  
CLEARY GOTTlieb STEEN & HAMILTON LLP  
2112 Pennsylvania Avenue, NW  
Washington, DC 20037

Paul Edward Coggins  
Brendon Patrick Gaffney  
LOCKE LORD LLP  
2200 Ross Avenue, Suite 2800  
Dallas, TX 75201

This 9<sup>th</sup> day of February 2022.

Respectfully submitted,

s/ Robert A Falanga

Robert A. Falanga, Esq.

Attorney Bar No. 254400

Interim Lead Class Counsel

s/ Kobelah Svensen Bennah

Kobelah Svensen Bennah

Attorney Bar No. 378113

LAW OFFICES

FALANGA & CHALKER

11200 Atlantis Pl #C

Alpharetta, GA 30022

Phone: (770) 955-0006

Fax: (770) 955-2123

robert@falangalaw.com

kobelah@falangalaw.com